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***Attorneys for Defendants Thomson  
Consumer Electronics, Inc. and Thomson SA***

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,

No. 07-cv-5944-SC  
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.  
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit  
City Stores, Inc. Liquidating Trust v.  
Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,  
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.  
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,  
No. 13-cv-05726;*

*Costco Wholesale Corporation v.  
Technicolor SA, et al., No. 13-cv-05723;*

**DECLARATION OF JEFFREY S.  
ROBERTS IN SUPPORT OF THOMSON  
SA'S OPPOSITION TO DIRECT  
ACTION PLAINTIFFS' MOTION TO  
ENFORCE THE COURT'S ORDER RE:  
THOMSON DISCOVERY**

Judge: Hon. Samuel Conti

1 *P.C. Richard & Son Long Island*  
2 *Corporation, et al. v. Technicolor SA, et al.,*  
3 *No. 31:cv-05725;*

4 *Schultze Agency Services, LLC, o/b/o*  
5 *Tweeter Opco, LLC, et al. v. Technicolor SA,*  
*Ltd., et al., No. 13-cv-05668;*

6 *Sears, Roebuck and Co. and Kmart Corp. v.*  
7 *Technicolor SA, No. 3:13-cv-05262;*

8 *Target Corp. v. Technicolor SA, et al., No.*  
9 *13-cv-05686*

10 *Tech Data Corp., et al. v. Hitachi, Ltd., et*  
*al., No. 13-cv-00157*

11 *Dell Inc. v. Hitachi Ltd.,*  
12 *No. 13-cv-02171;*

13 *Sharp Electronics Corp., et al. v. Hitachi,*  
14 *Ltd., et. al., No. 13-cv-01173*

15 *ViewSonic Corporation v. Chunghwa Corp.,*  
*et al., No. 14-cv-02510*

16

17 I, Jeffrey S. Roberts, hereby declare as follows:

18 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel  
19 for Defendants, Technicolor SA (f/k/a Thomson SA). I am an active member in good standing of  
20 the bars of the State of Colorado and am admitted to practice *pro hac vice* before the United  
21 States District Court for the Northern District of California. I make this declaration in support of  
22 Thomson SA's Response to the Sharp Plaintiffs' Statement Regarding Pending Discovery  
23 Motions. The statements contained in this declaration are based on my personal knowledge and,  
24 if called as a witness, I could competently testify to the following facts.

25 2. Counsel for Thomson SA are moving as quickly as possible to identify potentially  
26 responsive documents in Europe (where they have remained due to Thomson SA's attempts to  
27 comply with the blocking statute), move them to a platform from which its attorneys in the United  
28 States can evaluate the extent and nature of the documents preserved and arrange for expeditious

1 review and production of those documents, many of which are in French as well as other  
2 languages. Immediately following the Court's October 23, 2014, Order, counsel for Thomson SA  
3 undertook to obtain, access, and evaluate Thomson SA documents and data preserved in the  
4 course of producing documents in response the European Commission and United States  
5 Department of Justice investigations. The total volume of stored data exceeds 1.6 TB (1,600  
6 GB). Counsel for Thomson SA has arranged for this data to be transferred to the United States  
7 and loaded into an accessible format.

8 3. At this juncture, counsel for Thomson SA does not yet know how many potentially  
9 responsive documents are in the 1.6 TB.

10 4. Counsel for Thomson SA has also obtained three separate estimates for the  
11 processing, review, and production of this data. The estimates each reflect nearly \$200,000  
12 simply to process the documents and, depending on the actual number of documents in the 1.6 TB  
13 (estimated to be between 200,000 and 550,000), a potential cost of between approximately \$2  
14 million and upwards of \$4 million for a comprehensive review and production of the documents  
15 depending upon the number of documents that need to be reviewed.

16 5. Counsel for Thomson SA has informed counsel for DAPs that it is not able to  
17 provide "dates certain" until it has a better understanding of how much potentially responsive  
18 data it will need to review.

19 6. To the best of its knowledge, counsel for Thomson SA has now reviewed and  
20 produced to DAPs all non-privileged documents that were produced to the European Commission  
21 (the "EC Production"). This production consists of over 26,000 documents. The EC Production  
22 contains over 78,000 imaged pages including 9,700 files that were produced in native format with  
23 a coversheet stamped with a single bates number. Because many of these native files are twenty  
24 pages or longer, the EC Production likely contains hundreds of thousands of pages of documents.

25 7. Given its exit from the CRT industry several years prior to the investigations,  
26 counsel Thomson SA believes that the EC Production includes all potentially CRT-related  
27 documents and data responsive to DAPs' requests for production regarding competitor  
28 communications.

